

Kansas Immunization Program Wasted VFC Vaccine Policy

The Kansas Immunization Program (KIP) is charged with reducing Vaccine for Children's (VFC) vaccine losses due to wasted vaccines. Thousands of doses are wasted annually with values exceeding hundreds of thousands of dollars. The VFC vaccine program, (VFC, 317 and state funded vaccines) are funded by federal and state tax dollars. Wasted vaccines decrease the numbers of eligible children who could receive vaccines to prevent disease.

The Centers for Disease Control & Prevention revised and strengthened their VFC Program provider non-compliance processes beginning in 2009. Each state immunization program must implement these processes which are aimed at identifying and preventing waste, poor vaccine management processes and/or fraud or abuse in the VFC program. Overall vaccine management including documentation, proper vaccine storage and handling processes, reporting vaccine usage, temperature monitoring, and preventing avoidable waste are key to this compliance program.

KIP's goal is to educate and assist providers in identifying and preventing wasted vaccines and improve overall vaccine management processes. This policy is one component of these processes.

Processes:

1. Submit these documents by 10th of month following month of service:
 - a. Monthly immunization reports (MIR) and/or KsWebIZ monthly reconciliation;
 - b. Temperature logs
 - c. Wasted vaccine report
 - d. Borrowed vaccine logsReports that are still missing by the 30th of the month will result in suspension of vaccine orders until the documents are received.
2. Vaccine Waste is categorized as avoidable or unavoidable. Unavoidable waste occurs due to an act of nature that could not have been avoided (i.e., tornado wipes out a community). Avoidable waste is under the control of the provider and is preventable. Avoidable waste includes:
 - a. Refrigerator/freezer left open
 - b. Temperatures out of range and no action taken
 - c. Vaccine left out overnight
 - d. Over ordering based on provider profile and economic order quantity when reported vaccine inventory seems sufficient
 - e. Failure to notify KIP 3 months in advance of vaccine expiration date when provider will be unable to use all the doses on hand. This will allow KIP to place the vaccine doses on redistribution log. KIP will not list vaccine with expiration dates of one year or more. Listing vaccine on redistribution log *does not* absolve provider of responsibility. Providers who have excess vaccine should contact other VFC providers to determine if they could use the vaccine. Providers might share a box of vaccine with another provider versus ordering quantities they do not need and then wasting the doses

- f. Failure to properly package and transfer vaccines to another provider resulting in waste (i.e., shipping Varicella without dry ice)
- g. Vaccines with longer expiration dates administered prior to vaccines with shorter expiration dates
- h. Patterns of client eligibility not determined prior to vaccinating
- i. Patterns of vaccine drawn but not used

Policy:

1. Avoidable vaccine waste of 5% or greater is excessive and will require analysis and corrective action.
2. Providers with avoidable wasted vaccine 5% or greater at the end of one quarter will be contacted by KIP nurse consultants to assess provider vaccine management processes and allow KIP staff to assist the provider to decrease wastage in future quarters.
3. Providers are requested to specifically identify internal mechanisms to avoid wastage due to:
 - a. expired vaccines
 - b. improper storage and handling
 - c. equipment failures
 - d. staff education on vaccine management practices (i.e., stock rotation)
 - e. ordering patterns (inventory on-hand versus monthly/quarterly use)
4. Providers with two quarters of 5% or greater avoidable wasted vaccine will be required to submit a full vaccine inventory count with each vaccine order to help reduce wasted vaccines. This count shall be required for a period of 12 months and is documented on the submitted vaccine order form.
5. Unavoidable wasted vaccines shall be monitored by KIP. Unavoidable waste includes vaccines lost due to natural disasters or equipment failure when the provider has followed their written vaccine emergency policies and procedure which include attempting to relocate the vaccines to safe storage in a timely manner. Providers, who have vaccines insurance which covers these situations, are expected to refund the VFC covered amount to KIP; or, with program approval, may use the funds to upgrade their vaccine alarm or back-up systems. (Federal law prohibits financial gain from VFC vaccines.)
6. Providers may repay billable wasted vaccines with privately purchased vaccine when the following conditions are met:
 - a. approved in advance by KIP
 - b. documentation of repayment is completed on Wasted Vaccine Replacement Form
 - c. repayment is made with the same vaccine antigen wasted and is repaid within the agreed upon timeframe
 - d. replacement form is submitted with monthly MIR reports

7. Any unusable vaccine occurring from waste, expiration, or other event resulting in non-usable vaccine, must be reported on the VFC Wasted Vaccine Form in the month of the waste.
8. Cumulative avoidable wasted vaccine 5% or greater at the end of three quarters shall be billed and will include all wasted vaccine for that calendar quarter. Fourth quarter wastage will be billed at the end of the calendar year.
9. Provider who receive short-dated vaccines (less than 9 months to expiration date) from McKesson Distributors, are asked to report this to KIP immediately. Only in special circumstances should short-dated vaccines be shipped. Good faith efforts to use short-dated vaccines will not be billed if wasted unless the waste is due to gross negligence.
10. VFC providers who accept redistributed vaccine will not be billed for waste so long as the receiving provider has made a good faith effort to use all the vaccines prior to their expiration date. For example, if provider has 50 doses in stock and uses 15 doses monthly: Are 100 doses usable before the expiration dates?
11. All wasted vaccines will be monitored for patterns of waste.

A summary of wasted and unaccounted for vaccines will be sent to each VFC provider quarterly to provide them with a summary of their data.